

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**ELAINE M. COLEY,**

**Plaintiff,**

**v.**

**ALABAMA MEDICAID AGENCY,**

**Defendant.**

**CASE NO: 2:06cv378-WKW**

**DEFENDANT'S REQUESTS FOR  
ADMISSION TO PLAINTIFF**

Pursuant to Federal Rules of Civil Procedure 26 and 36, Defendant Alabama Medicaid Agency ("Medicaid") hereby requests that the Plaintiff Elaine M. Coley answer the following Requests for Admission in accordance with the definitions and instructions contained herein, the Federal Rules of Civil Procedure and the Local Rules of the Court.

**DEFINITIONS**

Unless otherwise specified, the following definitions shall apply to the Requests for Admission and other definitions:

1. The terms "you" and "your" mean you as the Plaintiff, and all, officers, directors, partners, trustees, employees, agents, representatives, investigators, accountants, lawyers, bankers, financial analysts or advisers, or other persons or parties acting on your behalf and include all individuals and entities who are no longer, but once were, in one of these positions, capacities, statuses or relationships during the relevant time period.

2. The terms “Defendant” and “Medicaid” refers to the Defendant identified in the Complaint as Alabama Medicaid Agency and any of its employees, agents, representatives, or any other persons acting for or on behalf of the Defendant as identified.

### **SPECIFIC REQUESTS**

1. Admit that while you were employed by Medicaid you did not suffer an adverse employment action because of your race.

2. Admit that while you were employed by Medicaid you were not treated less favorably than similarly situated employees outside your racial classification.

3. Admit that while you were employed by Medicaid you were not denied a promotion to any position for which you applied and for which you were also qualified.

Dated: October 11, 2006.

**s/Amanda C. Carter**

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**CERTIFICATE OF SERVICE**

I do hereby certify that on this the 10th day of October, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and that I mailed a copy of the foregoing to the Plaintiff, properly addressed and first class postage prepaid.

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**s/Amanda C. Carter**

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